

**Appeal No. 2015-1080**

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE FEDERAL CIRCUIT**

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MCRO, INC., DBA PLANET BLUE,

*Plaintiff-Appellant,*

v.

BANDAI NAMCO GAMES AMERICA INC., NAUGHTY DOG, INC.,  
KONAMI DIGITAL ENTERTAINMENT, INC., SEGA OF AMERICA, INC.,  
ELECTRONIC ARTS, INC., OBSIDIAN ENTERTAINMENT, INC., DISNEY  
INTERACTIVE STUDIOS, INC., SQUARE ENIX, INC., NEVERSOFT  
ENTERTAINMENT, INC., TREYARCH CORPORATION, CAPCOM USA,  
INC., SONY COMPUTER ENTERTAINMENT AMERICA LLC, ATLUS  
U.S.A., INC., SUCKER PUNCH PRODUCTIONS, LLC, INFINITY WARD,  
INC., LUCASARTS, A DIVISION OF LUCASFILM ENTERTAINMENT CO.  
LTD. LLC, WARNER BROS. INTERACTIVE ENTERTAINMENT, A  
DIVISION OF WARNER BROS. HOME ENTERTAINMENT INC.,  
ACTIVISION PUBLISHING, INC., BLIZZARD ENTERTAINMENT, INC.,  
VALVE CORPORATION, CODEMASTERS USA GROUP, INC.,  
CODEMASTERS SOFTWARE INC., CODEMASTERS, INC., AND THE  
CODEMASTERS SOFTWARE COMPANY LIMITED,

*Defendants-Appellees.*

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2015-1080, -1081, -1082, -1083, -1084, -1085, -1086, -1087, -1088, -1089, -1090,  
-1092, -1093, -1094, -1095, -1096, -1097, -1098, -1099, -1100, -1101

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Appeals from the United States District Court  
for the Central District of California in Nos. 2:12-CV-10322, 2:12-cv-10323, 2:12-  
cv-10327, 2:12-cv-10329, 2:12-cv-10331, 2:12-cv-10333, 2:12-cv-10335, 2:12-cv-  
10337, 2:12-cv-10338, 2:12-cv-10341, 2:12-cv-10342, 8:13-cv-01870, 8:13-cv-  
01874, 2:14-cv-00332, 2:14-cv-00336, 2:14-cv-00352, 2:14-cv-00358, 2:14-cv-  
00383, 2:14-cv-00389, 2:14-cv-00417, 2:14-cv-00439,  
Judge George H. Wu.

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**DEFENDANTS-APPELLEES' MOTION TO WITHDRAW EDWARD R.  
REINES AS COUNSEL**

Counsel listed in signature block

Pursuant to Federal Circuit Rule 47.3(c)(5), Defendants-Appellees Electronic Arts Inc.; Capcom USA, Inc.; Activision Publishing, Inc.; and Blizzard Entertainment, Inc. hereby move to withdraw Edward R. Reines as counsel. Sonal N. Mehta has entered an appearance to represent Defendants-Appellees Activision Publishing, Inc., Blizzard Entertainment, Inc., Capcom USA, Inc. and Electronic Arts Inc., as lead counsel. Accordingly, Mr. Reines' withdrawal would create no prejudice to the aforementioned Defendants-Appellees.

Counsel for Defendants-Appellees, Edward R. Reines, has notified Plaintiff-Appellant of his withdrawal, and Plaintiff-Appellant does not object to the withdrawal.

For these reasons, Defendants-Appellees Activision Publishing, Inc., Blizzard Entertainment, Inc., Capcom USA, Inc. and Electronic Arts Inc. respectfully request that this Court grant their Motion to Withdraw Edward R. Reines as Counsel.

Dated: October 28, 2015

Respectfully submitted,

By /s/ Edward R. Reines

Edward R. Reines

WEIL, GOTSHAL & MANGES LLP

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*Attorneys for Defendants-Appellees*

Bandai Namco Games America, Inc.; Sega  
of America, Inc.; Electronic Arts Inc.;

Disney Interactive Studios, Inc.; Neversoft  
Entertainment, Inc.; Treyarch Corporation;

Capcom USA, Inc.; Atlus U.S.A., Inc.;

Infinity Ward, Inc.; LucasArts, a division  
of LucasFilm Entertainment Company Ltd.

LLC; Warner Bros. Interactive

Entertainment, a division of Warner Bros.

Home Entertainment Inc.; Activision

Publishing, Inc.; and Blizzard

Entertainment, Inc.

**CERTIFICATE OF INTEREST**

Counsel for Defendants-Appellees Bandai Namco Games America, Inc.; Sega of America, Inc.; Electronic Arts Inc.; Disney Interactive Studios, Inc.; Neversoft Entertainment, Inc.; Treyarch Corporation; Capcom USA, Inc.; Atlus U.S.A., Inc.; Infinity Ward, Inc.; LucasArts, a division of LucasFilm Entertainment Company Ltd. LLC; Warner Bros. Interactive Entertainment, a division of Warner Bros. Home Entertainment Inc.; Activision Publishing, Inc.; and Blizzard Entertainment, Inc. certifies as follows:

1. The full name of every party or amicus represented by us is:

<b>Docket Number</b>	<b>Parties Represented</b>
No. 15-1080	Bandai Namco Games America, Inc.
No. 15-1082	Sega of America, Inc.
No. 15-1083	Electronic Arts Inc.
No. 15-1085	Disney Interactive Studios, Inc.
No. 15-1087	Capcom USA, Inc.
No. 15-1089	Neversoft Entertainment, Inc.
No. 15-1090	Treyarch Corporation
No. 15-1092	Atlus U.S.A., Inc.
No. 15-1094	Activision Publishing, Inc. and Blizzard Entertainment, Inc.
No. 15-1095	LucasArts, a division of Lucasfilm Entertainment Company Ltd. LLC
No. 15-1097	Infinity Ward, Inc.
No. 15-1098	Warner Bros. Interactive Studios, a division of Warner Bros. Home Entertainment Inc.

2. The name of the real party in interest represented by us is:

None

3. All parent corporations and any public companies that own 10 percent or more of the stock of the parties represented by us are:

<b>Docket Number</b>	<b>Parties Represented</b>	<b>All parent corporations and any public companies that own 10 percent or more of the stock of the party represented by us</b>
No. 15-1080	Bandai Namco Games America, Inc.	Bandai Namco Holdings (USA) Inc.; Bandai Namco Holdings Inc.
No. 15-1082*	Sega of America, Inc.	Sega Corporation; Sega Sammy Holdings Inc.
No. 15-1083*	Electronic Arts Inc.	None
No. 15-1085*	Disney Interactive Studios, Inc.	Disney Enterprises, Inc.; The Walt Disney Company
No. 15-1087*	Capcom USA, Inc.	Capcom Co., Ltd.
No. 15-1089*	Neversoft Entertainment, Inc.	Activision Publishing, Inc.; Activision Blizzard, Inc.; ASAC II LP
No. 15-1090*	Treyarch Corporation	Activision Publishing, Inc.; Activision Blizzard, Inc.; ASAC II LP
No. 15-1092*	Atlus U.S.A., Inc.	Atlus Co., Ltd.; Sega Corporation; Sega Sammy Holdings Inc.
No. 15-1094*	Activision Publishing, Inc. and Blizzard Entertainment, Inc.	Activision Blizzard, Inc.; ASAC II LP
No. 15-1095*	LucasArts, a division of Lucasfilm Entertainment Company Ltd. LLC	Lucasfilm Entertainment Company Ltd. LLC; Lucasfilm Ltd. LLC; The Walt Disney Company
No. 15-1097*	Infinity Ward, Inc.	Activision Publishing, Inc.; Activision Blizzard, Inc.; ASAC II LP
No. 15-1098*	Warner Bros. Interactive Studios, a division of Warner Bros. Home Entertainment Inc.	Warner Bros. Home Entertainment Inc.; Warner Bros. Entertainment Inc.; Warner Communications LLC; Historic TW Inc.; Time Warner Inc.

4. The names of all law firms and the partners or associates that appeared for the parties now represented by us in the trial court or are expected to appear in this Court are:

<b>Docket Number</b>	<b>Parties Represented</b>	<b>Law Firms, Partners and Associates</b>
No. 15-1080	Bandai Namco Games America, Inc.	Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal & Manges LLP
No. 15-1082*	Sega of America, Inc.	Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal & Manges LLP
No. 15-1083*	Electronic Arts Inc.	Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal & Manges LLP
No. 15-1085*	Disney Interactive Studios, Inc.	Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal & Manges LLP
No. 15-1087*	Capcom USA, Inc.	Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal & Manges LLP
No. 15-1089*	Neversoft Entertainment, Inc.	Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal & Manges LLP
No. 15-1090*	Treyarch Corporation	Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal & Manges LLP
No. 15-1092*	Atlus U.S.A., Inc.	Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal & Manges LLP
No. 15-1094*	Activision Publishing, Inc.	Sonal N. Mehta, Edward R. Reines,

	and Blizzard Entertainment, Inc.	<p>Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal &amp; Manges LLP</p> <p>Jack B. Blumenfeld Rodger Dallery Smith, II Morris, Nichols, Arsht &amp; Tunnell LLP</p>
No. 15-1095*	LucasArts, a division of Lucasfilm Entertainment Company Ltd. LLC	<p>Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal &amp; Manges LLP</p> <p>Jack B. Blumenfeld Rodger Dallery Smith, II Morris, Nichols, Arsht &amp; Tunnell LLP</p>
No. 15-1097*	Infinity Ward, Inc.	<p>Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal &amp; Manges LLP</p> <p>Jack B. Blumenfeld Rodger Dallery Smith, II Morris, Nichols, Arsht &amp; Tunnell LLP</p>
No. 15-1098*	Warner Bros Interactive Studios, a division of Warner Bros. Home Entertainment Inc.	<p>Sonal N. Mehta, Edward R. Reines, Evan N. Budaj, Justin M. Lee, Marion McLane Read Weil, Gotshal &amp; Manges LLP</p> <p>Jack B. Blumenfeld Rodger Dallery Smith, II Morris, Nichols, Arsht &amp; Tunnell LLP</p>

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2015, I filed or caused to be filed copies of the foregoing with the Clerk of the United States Court of Appeals for the Federal Circuit via the CM/ECF system and served or caused to be served a copy on all counsel of record by the CM/ECF system and electronic mail.

Dated: October 28, 2015

/s/ Edward R. Reines

Edward R. Reines

*Counsel for Defendants-Appellees*  
Bandai Namco Games America, Inc.;  
Sega of America, Inc.; Electronic Arts  
Inc.; Disney Interactive Studios, Inc.;  
Neversoft Entertainment, Inc.; Treyarch  
Corporation; Capcom USA, Inc.; Atlus  
U.S.A., Inc.; Infinity Ward, Inc.;  
LucasArts, a division of LucasFilm  
Entertainment Company Ltd. LLC;  
Warner Bros. Interactive Entertainment,  
a division of Warner Bros. Home  
Entertainment Inc.; Activision  
Publishing, Inc.; and Blizzard  
Entertainment, Inc.